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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

RAYMOND WARE,)	CIVIL NO. 04-00671 HG/LEK
)	
Plaintiff,)	PLAINTIFF'S SECOND MOTION TO
)	COMPEL DISCOVERY; DECLARATION
vs.)	OF COUNSEL; EXHIBITS "1", "2" & "3";
)	MEMORANDUM OF LAW;
)	CERTIFICATE OF SERVICE
SIDNEY HAYAKAWA, Director of)	
Transportation Security Administration -)	
Honolulu, KEN KAMAHELE, Deputy)	
Director, Transportation Security)	DATE: _____
Administration-Honolulu;)	
TRANSPORTATION SECURITY)	TIME: _____
ADMINISTRATION; THOMAS J.)	
RIDGE, Secretary, Department of)	JUDGE: Mag. Leslie E. Kobayashi
Homeland Security, DEPARTMENT OF)	
HOMELAND SECURITY; JOHN DOES)	
2-5,)	
)	
Defendants.)	
_____)	

TO: EDWARD H. KUBO, JR., ESQ.
U.S. Attorney
THOMAS HELPER, ESQ.
Assistant U.S. Attorney
U.S. Attorney's Office, District of Hawaii
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Honolulu, Hawaii 96850

Attorneys for Federal Defendants

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

RAYMOND WARE,)	CIVIL NO. 04-00671 HG/LEK
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Plaintiff,)	PLAINTIFF'S SECOND MOTION TO
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vs.)	
)	
SIDNEY HAYAKAWA, Director of)	
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Honolulu, KEN KAMAHELE, Deputy)	
Director, Transportation Security)	
Administration-Honolulu;)	
TRANSPORTATION SECURITY)	
ADMINISTRATION; THOMAS J.)	
RIDGE, Secretary, Department of)	
Homeland Security, DEPARTMENT OF)	
HOMELAND SECURITY; JOHN DOES)	
2-5,)	
)	
Defendants.)	
_____)	

PLAINTIFF'S SECOND MOTION TO COMPEL DISCOVERY

Comes now Plaintiff RAYMOND WARE, by and through his attorney, Daphne E. Barbee, and hereby files this Second Motion To Compel to order Defendant to provide discovery requested in his Request For Production of Documents and Request For Answers To Interrogatories to Defendant.

This Motion is made pursuant to Rules 26 , 33, 34 and 37, Federal Rules of Civil Procedure, the United States Constitution, 42 U.S.C. Sec. 2000e et.seq. and made after meet-and-confer telephone discussion held on March 3, 2006 by and between Assistant U.S. Attorney Thomas Helper and Attorney Jim Velascos of TSA in California.

DATED: Honolulu, Hawaii, 3-20-06.

D E B

DAPHNE E. BARBEE
Attorney for Plaintiff